

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

Leslie Nicole Knight and Alveza
Valenzuela, Individually and On
Behalf of Others Similarly Situated,

Plaintiffs,

V.

CIVIL ACTION NO. 5:24-cv-1097-XR

Thomas Jeneby, M.D. a/k/a "Dr. Boom Boom Pow," The Plastic and Cosmetic Center of South Texas, P.A., Palm Tree Plastic Surgi-Center, LLC, Trilogy by Dr. Jeneby, Inc., Advanced Medical Support Services, PLLC, Chrysalis Cosmetic Surgery Center, PLLC, South Texas Aesthetic Training LLC and Shining Palm Tree Series, LLC

Defendants.

**JOINT MOTION FOR ENTRY OF AGREED CONFIDENTIALITY AND PROTECTIVE
ORDER**

COME NOW, Plaintiffs Leslie Nicole Knight and Alveza Valenzuela, Individually and On Behalf of Others Similarly Situated (collectively, “Plaintiffs”) and Defendants Thomas Jeneby, M.D.; The Plastic and Cosmetic Center of South Texas, P.A.; Palm Tree Plastic Surgi-Center, LLC; Trilogy by Dr. Jeneby, Inc.; Advanced Medical Support Services, PLLC; Chrysalis Cosmetic Surgery Center, PLLC; South Texas Aesthetic Training LLC; and Shining Palm Tree Series, LLC (collectively, “Defendants”), and file this Joint Motion for Entry of Agreed Confidentiality and Protective Order, respectfully showing the Court as follows:

I.

The parties are actively engaged in the discovery process. As part of this process, portions of information to be disclosed may be considered by one of the parties to be confidential and/or proprietary in nature. As a result, the parties have agreed to terms under which such materials may be marked as confidential and/or for counsel's eyes only, the process by which such materials will be protected from further disclosure, and related procedural matters. Attached hereto as **Exhibit A** is a copy of the Agreed Confidentiality and Protective Order sought to be entered in this lawsuit.

WHEREFORE, PREMISES CONSIDERED, Plaintiffs and Defendants request that this Court grant this Joint Motion for Entry of Agreed Confidentiality and Protective Order and enter the Agreed Confidentiality and Protective Order attached hereto as Exhibit A.

Respectfully submitted,

/s/ Josef F. Buenker w/permission

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CERTIFICATE OF SERVICE

I hereby certify that on this 13th day of March 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

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